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DATE : August 18, 1986
TO : Dick Stretch
FROM : Lynn Davison *LD*
SUBJECT : Draining and Refilling a PCB Contaminated Transformer

I understand that some time this month you will be pumping oil from an auxiliary transformer in the dam. This transformer is small so doesn't contain a lot of oil ((100 gallons?) but it has 200 ppm PCBs. As you prepare your work plan for this task, please keep the following precautions in mind:

BEFORE PUMPING:

1. Completely seal off the drain at the bottom of the manhole that the transformer is in.
2. Be prepared for a quick spill response in case of an accident. Have ample oil absorbent material on site.
3. Place 6 mil. plastic sheeting and absorbent pads under the barrels to be filled so that if overflow does occur, spillage will be contained.
4. Consult with the Safety Unit (x3270) as to the level of personal protective equipment that is recommended.

DURING PUMPING:

1. Leave 8" to 10" headspace in each drum that you fill.
2. If a spill does occur, keep in mind the following priorities:
 - a) Protect human health and safety.
 - b) Contain the spread of the spill, giving first attention to any threats to water.
 - c) Clean up.

3. If spillage occurs, avoid spreading contamination by tracking. Establish an access zone, with polyethylene sheeting, where protective boots can be put on and taken off.
4. Clean up by using absorbents for free-standing oil and then scrubbing surfaces with a detergent (either Power Cleaner 155, Trisodium phosphate, or Amway LOC Soap works best on PCBs). Remember that rags and protective clothing must be disposed of as PCB waste in a drum.

AFTER PUMPING:

- 1) Decontaminate the pump by flushing it with kerosene. Alternate pumping with periods of time to allow the kerosene to soak in the pump. Use ample kerosene making sure the kerosene pumps clear in color before you've finished. Collect the kerosene rinsate in another drum, and again leave 10" headspace.
- 2) Label all the drums with the contents, date of filling, your name, and in the case of the oil, the PCB analysis method, date and results.
- 3) Store the drum of kerosene indoors to prevent it heating to flash point. The PCB-contaminated oil, kerosene, and debris must be stored in a manner that complies with subpart D of the Toxic Substances Control Act. Temporary storage up to thirty days is allowed with the following requirement:
 - a) Weekly inspections for leaks are conducted and documented;
 - b) a spill prevention control and countermeasure plan is prepared for the temporary storage area; and
 - c) the storage area is labeled with a yellow vinyl PCB sticker.
- 4) When the drums are loaded for transport, ensure that they are secured so that they will remain upright. Include in the shipment or ensure the truck operator has provided spill response equipment (protective gear, sorbents, empty drum and pump, rags, detergent).

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If you have any questions, please feel free to call Terry Kakida (x3956) or Chris Luboff (3798). We expect that the pumping job will go smoothly but want to ensure that all participants are prepared in the unlikely event of an accident.

KB:jf

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File

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